

## Question & Answer Session

### CWNS 2008 Training: Documenting Decentralized Wastewater Needs

October 2, 2007

Q: Please define decentralized as it is being used for the CWNS. What types of systems are included in the definition of decentralized systems?

A: *EPA's Decentralized Program defines decentralized wastewater treatment as either an onsite system or a cluster system:*

- *An onsite wastewater treatment system relies on natural processes and/or mechanical components to collect, treat, and disburse or reclaim wastewater from a single dwelling or building. This is what many people refer to as a septic system.*
- *Cluster systems collect water from two or more dwellings or buildings and convey it to a treatment and disbursement system located on a suitable site near the buildings.*

*Typically, these systems treat wastewater using the same type of facility that is located near the source. Another way to look at it is, those systems are not on public sewer systems.*

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Q: Is there a size limitation for what is considered a decentralized system? Is there a flow threshold between a decentralized system and a POTW? At a certain flow would you consider it a POTW, rather than a decentralized system?

A: *For CWNS, we do not look at flow to distinguish decentralized systems from Publicly Owned Treatment Works (POTWs). There is no flow threshold between decentralized systems and POTWs.*

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Q: Do decentralized systems include systems with a NPDES permit?

A: *Clustered systems that have an individual NPDES permit are not considered decentralized systems. For CWNS, they are tracked as POTWs, and needs are submitted in Category I or II.*

*For the purpose of CWNS, an onsite wastewater treatment system is considered a decentralized system even if it is covered in a general NPDES permit. It is not common for onsite systems to have a NPDES permit. There are a few instances where onsite systems are included in a general NPDES permit, meaning, they are included in a general category that is regulated by the NPDES program because they discharge to surface waters, however, for CWNS, these onsite systems are included as decentralized systems.*

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Q: Is the construction of new decentralized system a valid need for the 2008 Need Survey? My understanding of the 2004 eligibility requirements was that decentralized treatment systems installed as a part of new residential developments do not represent an eligible need. Is this changing?

*A: For CWNS 2008, new decentralized systems are CWNS eligible. This is a change from CWNS 2004 and a result of CWSRF eligibility no longer being a requirement for CWNS eligibility.*

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Q: Does the term “new systems” refer to new developments? What is the definition of new system?

*A: A new decentralized system is one where there was no previously system, for example new developments. A replacement decentralized system is one that is built to replace a failing or outdated system. It serves the same dwelling(s)/building(s) as the previous system that it is replacing.*

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Q: Regarding that fact that new decentralized systems will be CWNS eligible, how will the CWNS distinguish between SRF eligible and non-eligible so the costs can be separated out in the RTC?

*A: That is the reason for distinguishing between “new” and “replacement” decentralized systems. “New” systems are not SRF eligible and “replacement” systems are SRF eligible. In the Data Entry System (DES), for all needs (not just decentralized needs) state coordinators will have to identify what percentage of the need are SRF eligible. This percentage will be used for separating needs in the Report to Congress*

*Resources related to SRF eligibility, including a recording and Q & A from the CWSRF Eligibility Web Seminar, are available at <http://www.epa.gov/cwns/webseminar.htm>. In 2008, we will also have a library of information on SRF eligibility.*

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Q: Being that EPA has not finalized the CWNS 2004 Report to Congress, when do we expect that the CWNS 2008 will be finalized?

*A: The CWNS 2004 survey has not yet been finalized. In reference to the CWNS 2008, we do have an aggressive schedule at EPA to finalize our part by the summer of 2009. The CWNS 2008 data collection period will go from January to October 2008. Data review will be from November 2008 through February 2009. The report will undergo revisions and EPA internal review from March into the summer of 2009. EPA will submit CWNS 2008 to OMB for review in the summer of 2009.*

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Q: Does that mean that we will see the 2004 survey finalized before the CWNS 2008 data collection period?

*A: We are optimistic on this scenario, EPA management is giving this high priority.*

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Q: Will Chesapeake Bay POTW Nutrient Removal projects be included in the CWNS?

*A: Yes, they will be eligible. All projects relating to POTW nutrient removal are eligible to be included in the CWNS 2008, as long it is a need as of January 1, 2008.*

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Q: You stated that detailed information is requested to be provided (effluent, flow, etc) for wastewater treatment plant needs. Why? This is immaterial to capital needs that may be needed

*A: Technical data (effluent, flow, etc.) are required for various purposes. One is the Report to Congress. The report summarizes that information so that Congress can associate various needs with technical information and see the results they are getting for SRF and other federal assistance programs (e.g. how much increase has there been in gallons / population receiving secondary or advanced treatment). The other main reason is, the information collected for this report is used by a lot of other EPA programs. The technical information allows needs information to be correlated with EPA programs. EPA uses the data to understand state/local needs and inform program planning and development.*

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Q: Who is coordinating the CWNS for US EPA Region 9?

*A: A list of all the State and EPA Regional Coordinators are available at <http://www.epa.gov/cwns/wherelive.htm>.*

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Q: Are completed projects/facilities allowed to be submitted as they are completed, or do states have to wait till November to enter all needs?

*A: States can submit completed information for each project/facility as it is finished.*

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Q: After individual needs are completed and submitted by States - will the state have an opportunity to rebut rejected surveys?

*A: Yes, with a couple exceptions. The Data Entry System (DES) will have a comment area for EPA reviewers to communicate with states why a need was rejected. The State or other party will have the opportunity to respond to those comments and to fix any problems that are identified.*

*The exceptions to when a need cannot be corrected are:*

- (1) The end of the survey. Frequently, several States submit a lot of needs right at the end of the survey. There is a data entry deadline at the end of the survey. A few weeks after that there is a data correction deadline. In some cases the volume of rejected needs is too large for the State to have time to respond to all the comments before the data correction deadline.*

- (2) *Footnoted documents. The September 25 seminar presented information on the footnoted documents and other documentation issues. If you want more details, you can refer to materials from that presentation available at <http://www.epa.gov/cwns/webseminar.htm>. In general, if you are documenting needs under \$20 million, the documents can be retained at the State. This avoids sending them to EPA. However, EPA does an audit on a small percentage of different types of documents that are footnoted. Within each document type, if the audit reveals that a certain number of needs have failed within that document type, then the whole class of footnoted needs within that document type are rejected. So, it is a pass/fail for the whole set of documented needs within the document type class that is being audited. If states submit 50% of data by a predetermined date, they will have the chance for a second set of documents to be audited if the first set fails.*
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Q: In order to assess Decentralized needs, it will be critical to ensure those who are reporting needs understand what decentralized means. How will EPA, aside from this webcast, accomplish this?

A: *We are trying to accomplish this in a variety of ways.*

- (1) *This Web seminar, which is being recorded and will be available to those who missed it.*
  - (2) *EPA has been working with the State Onsite Regulators Alliance (SORA). For the past two years, Eleanor Krukowski (NJ) and/or Karen Fligger (EPA) have made presentations at the annual SORA meeting. EPA is also using the SORA list server to announce CWNS related information.*
  - (3) *The CWNS program and Joyce Hudson's decentralized program have been working closely to coordinate CWNS-decentralized activities. The CWNS program participates in the EPA Regional Decentralized Coordinators conference call to update the EPA regions about CWNS and invite them to pass information to their States.*
  - (4) *EPA and a group of volunteers from the decentralized community have created a best practices guide for entering Decentralized needs in CWNS. It is available at <http://www.epa.gov/cwns/cwns2008.htm> under the heading Resources.*
  - (5) *EPA also works with the State-Local Interaction Subcommittee (SLIS), composed of people from the States and various organizations who work with local governments and municipalities. SLIS members help us to get the word out and issues that may be of interest to communities.*
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Q: Outreach is being conducted to SORA, but often the onsite regulatory programs are located in the Health Department, not the Water agency. Some facilitated communication will be necessary to bridge this separation.

A: *Most of the people at SORA are actually from the Health Departments. So, SORA is one of the ways we are trying to reach the Health Department, as opposed to the Water Agencies. Generally, decentralized staff in the water agencies work more closely with State CWNS staff.*

*We are open to suggestions to better reach a group of people. Send suggestions to Karen Fligger at [fligger.karen@epa.gov](mailto:fligger.karen@epa.gov).*

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Q: Which states did not reported needs in 2004 survey?

*A: Only Alaska did not report needs in CWNS 2004. All the other States did report needs. There is some variance in the level of participation in submitting needs across the categories. We expect Alaska will submit needs in 2008. We have taken steps with Michelle Tucker, the CWNS Region 10 Coordinator, to help facilitate Alaska's participation.*

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Q: In Impaired Waters and waters with TMDL, will on-site systems be considered as a need in the CWNS assuming no de-nitrification technology is provided?

*A: We interpret this question as meaning that the submitter does not have information about the technology which will be used to address the need. Yes, that is allowable. In general, if there is no documentation showing that the technology will change, then the submitter should assume that the current technology will be repaired to address the needs. The presenter has talked about different methods for estimating costs, if this technology information isn't available.*

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Q: Are you familiar with the new CWSRF eligibilities based on the "white paper?" Specifically, house laterals can now be considered CWSRF eligible..."The portion of a privately-owned centralized wastewater treatment works that are associated with the collection and treatment of effluent from properties with failing decentralized systems including the house lateral".

*A: The EPA CWSRF program has a White Paper (titled "Tapping its Untapped Potential") out for review/comments. It will not be finalized until spring 2008. It has various options for modifying definitions of SRF eligibility. We have been working with the SRF program, and are aware of things in the White Paper. We are ready if and when these eligibilities become official. At that time, we will have Outreach material available to educate the CWNS community about CWSRF eligibility changes.*

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Q: How will the CWNS account for the costs to solve decentralized problems with point source solutions?

*A: In 2004 and earlier surveys, as well as in 2008 and into the future, there are data elements within DES that allow states to identify the category I and II needs that are specifically addressing a failing or overwhelmed decentralized treatment system. The data system does track that data and allows us to summarize of centralized wastewater treatment solutions for decentralized needs.*

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Q: Slide 28- does Permit Issued mean a discharge permit?

*A: The “permit” mentioned is not a NPDES permit, but a state or local permit for the installation or operation of a system. In many States, decentralized and onsite wastewater is managed by different entities (both state and local). The kinds of permits that are required vary from State to State, and even from municipality to municipality. So, for permits, it is a broad statement about the various kinds of permits that are may used. It could be state or local permits.*

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Q: Have the decentralized cost curves been updated to reflect modern, more expensive technologies? That cost curve has calculated extremely low costs in past surveys.

*A: Yes, they have been updated for 2008. On November 27, we will have a Web seminar focused on all cost curves in DES. In that seminar, Jon Harcum, who is the lead contractor on updating the cost curves, will present an overview of all the cost curves of the system.*

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Q: Slide 31- What do you consider to be innovative systems for purposes of documentation?

*A: For the purposes of the CWNS cost curve, an “Innovative or Alternative System” refers to any type of Onsite Wastewater Treatment System that includes technology more complex than that of a Conventional System (traditional gravity-fed tank and trench system).*

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Q: Slide 28- Can a TMDL and a 319 accepted watershed based plan serve as need and cost?

*A: The answer to the first part of the question is that a TMDL and a 319 can serve as documentation for needs. For documenting costs, these document types are not universally approved. It is a case by case basis, and the reason for that is, there is a lot of variability in the site-specific cost information in the watershed basin plans.*

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Q: Is the decentralized best practices guide on the CWNS web site?

*A: Yes, it is available at <http://www.epa.gov/cwns/cwns2008.htm> under the heading Resources.*

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Q: Could it be assumed that all existing onsite decentralized systems will need to be rehab/replaced within the 20 year survey horizon?

*A: No. We haven’t got that indication with our work with decentralized programs, both here at EPA and with the States. The needs for rehabilitating and replacing the systems need to follow the criteria outlined in the presentation.*

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Q: If the costs for new decentralized systems are not eligible for SRF funding, what is the incentive to enter this data? If we only have one person collecting and entering all the CWNS

data, it will be very difficult to find the time to collect and enter data that is not related to our SRF funding.

*A: At the beginning of the presentation, six reasons for entering needs were outlined. The primary benefit is for programmatic reasons. This technical information and the data can be used for things broader than SRF funding. Entering needs that are not SRF eligible provides the state a more complete picture of the needs for decentralized wastewater management and more broadly the water quality and public health situation. This helps state/municipalities/EPA develop their decentralized support programs in a way that provides the most relevant technical assistance and outreach materials..*

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Q: When you refer to new on-site systems, can you include estimates for future homes if you have rates of past growth in areas?

A: That falls within the Innovative Documentation Methods. If you get information that can be used to project future home growth based on past growth, you can submit that to EPA Headquarter through your EPA Regional contact in advance for pre-approval consideration. Information about the pre-approval process is available at <http://www.epa.gov/cwns/method.htm>.

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Q: Is repair of decentralized systems SRF eligible?

*A: Yes. Repairs and replacements of existing decentralized systems are SRF eligible.*

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Q: What if our state's SRF program does not cover any of the decentralized systems?

*A: When we talk about SRF eligibility for the CWNS, we are talking about federal SRF eligibility requirements. Many States have their own requirements that may be more stringent than what is allowable at the federal level; we distinguish SRF eligibility and non-SRF eligibility based on those federal eligibility requirements. Stephanie VonFeck (EPA) presented a great presentation that explained those federal eligibility requirements in detail. Materials from that presentation is available at <http://www.epa.gov/cwns/webseminar.htm>*

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Q: Can we combine the new Cat XII needs with Cat I thru V needs in the same facility in the CWNS system or do decentralized needs need to be their own "facility?"

A: Yes

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Q: In the 2004 survey, we entered facilities/communities (some over 100,000 pop) with centralized treatment systems and a small number of "outlyer" onsite systems (say 30) within their jurisdiction as one facility. Will these situations now need to be entered as two facilities?

*A: They can be entered in one facility.*

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Q: What is the deadline for submitting pre-approval methodology to EPA for review?

*A: We are doing pre-approval now. It started in July through December 15. So, anytime between now and December 15 you can submit innovative methodologies to EPA for consideration.*

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Q: If we decide on an innovative process but don't get it submitted before December deadline, can it still be considered and approved for use?

*A: After the data entry period begins, we will have another period for pre-approval of methodologies.*

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